

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|--------------------------|---|---|
| CARMEN PLASCENCIA |) | CASE NO. 1:19-cv-02046 |
| |) | |
| Plaintiff, |) | JUDGE JAMES S. GWIN |
| |) | |
| vs. |) | MAGISTRATE JUDGE DAVID A. |
| |) | RUIZ |
| TAPATIAS FOOD LLC, D/B/A |) | |
| TAPATIA'S TAQUERIA |) | <u>PRELIMINARY ESTIMATE OF</u> |
| |) | <u>ATTORNEYS' FEES AND COSTS</u> |
| Defendant. |) | |

Pursuant to the Court's Case Management Conference Scheduling Order, Plaintiff submits the following Preliminary Estimate of Attorneys' fees and costs:

INTRODUCTORY STATEMENT

The following attorneys' fees itemization is a preliminary estimate and/or budget of the amount of fees and expenses anticipated to be the subject of Plaintiff's claims. Plaintiff reserves the right to supplement this itemization.

ATTORNEYS' FEES ITEMIZATION

| <u>Attorneys' fees</u> | <u>Expenses</u> |
|--|------------------------------------|
| Preliminary Investigation, Research, and Complaint: \$5,000.00 | Filing Fee: \$400.00 |
| Discovery: \$15,000.00 | Depositions: \$10,000.00 |
| Dispositive Motions Practice: \$30,000.00 | Experts: n/a |
| Damage Calculations, Settlement Negotiations and Court Approval: \$15,000.00 | Witness Fees: \$1,000.00 |
| | Other: \$4,000.00 |
| | Total Expenses: \$15,400.00 |
| Trial: \$60,000.00 | |
| Total Fees: \$125,000.00 | |

Respectfully submitted,

/s/ Lori M. Griffin
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2020, a copy of the foregoing *Plaintiff's Preliminary Estimate of Attorneys' Fees and Costs* was sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's system.

/s/ Lori M. Griffin
One of the Attorneys for Plaintiffs